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*Attorneys for Plaintiff, Wells Fargo Bank, N.A. Successor by Merger to Wells Fargo Bank
Minnesota, N.A., f/k/a Norwest Bank Minnesota, N.A. solely as Trustee for Structured Asset
Mortgage Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-
Through Certificates, Series 2007-AR1*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WELLS FARGO BANK, N.A. SUCCESSOR
13 BY MERGER TO WELLS FARGO BANK
14 MINNESOTA, N.A., F/K/A NORWEST
15 BANK MINNESOTA, N.A. SOLELY AS
16 TRUSTEE FOR STRUCTURED ASSET
17 MORTGAGE INVESTMENTS II INC. BEAR
18 STEARNS MORTGAGE FUNDING TRUST
19 2007-AR1, MORTGAGE PASS-THROUGH
20 CERTIFICATES, SERIES 2007-AR1,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,
24 INC.; FIDELITY NATIONAL TITLE
25 INSURANCE COMPANY; GREAT
26 AMERICAN TITLE; DOE INDIVIDUALS I
27 through X; and ROE CORPORATIONS XI
28 through XX, inclusive,

Defendants.

Case No.: 2:20-cv-02155-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF Nos. 20
& 21]**

[Second Request]

Plaintiff, Wells Fargo Bank, N.A. Successor by Merger to Wells Fargo Bank Minnesota,
N.A., f/k/a Norwest Bank Minnesota, N.A. solely as Trustee for Structured Asset Mortgage
Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-Through
Certificates, Series 2007-AR1 (“Wells Fargo”), Defendant Fidelity National Title Insurance

1 Company (“FNTIC”) and Specially-Appearing Defendant, Fidelity National Title Group, Inc.
2 (“Fidelity” collectively “Defendants”), by and through their counsel of record, hereby stipulate
3 and agree as follows:

- 4 1. On November 23, 2020, Wells Fargo filed its Complaint in Eighth Judicial District
5 Court, Case No. A-20-825298-C [ECF No. 1-1];
- 6 2. On November 23, 2020, FNTIC filed its Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On January 25, 2021, FNTIC filed a Motion to Dismiss [ECF No. 20];
- 9 4. On January 25, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 21];
- 10 5. On February 8, 2021 the Court entered a Stipulation and Order to Extend Time
11 Period to Respond to the Motions to Dismiss [ECF No. 20 and ECF No. 21]
- 12 6. Wells Fargo’s deadline to respond to Defendants’ Motions to Dismiss is currently
13 March 9, 2021 [ECF No. 30];
- 14 7. Wells Fargo’s counsel is requesting an additional extension until April 9, 2021, to
15 file its response to Defendants’ pending Motions to Dismiss;
- 16 8. This extension is requested to allow Wells Fargo additional time to finalize and file
17 its response to the pending Motions to Dismiss as lead handling counsel for Wells
18 Fargo continues to recover from an unexpected medical emergency and an associate
19 attorney for Wells Fargo recently contracted the COVID-19 virus.
- 20 9. Additionally, the Parties are currently considering whether a stay of discovery is
21 warranted in order to litigate this case as efficiently as possible and to conserve
22 resources.
- 23 10. Counsel for Defendants does not oppose the requested extension;

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11. This is the second request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 8th day of March, 2021.

DATED this 8th day of March, 2021.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

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Attorneys for Plaintiff, Wells Fargo Bank,

Attorney for Defendants, Fidelity National

N.A. Successor by Merger to Wells Fargo

Title Group, Inc. and Fidelity National Title

Bank Minnesota, N.A., f/k/a Norwest Bank

Insurance Company

Minnesota, N.A. solely as Trustee for

Structured Asset Mortgage Investments II


Inc. Bear Stearns Mortgage Funding Trust

2007-AR1, Mortgage Pass-Through

Certificates, Series 2007-AR1

IT IS SO ORDERED.

Dated this 10th day of March, 2021.


RICHARD E. BOULWARE, II
United States District Court